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VIA ECF

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: Picard v. Avellino, et al., Adv. Pro. No. 10-05421 (SMB)

Dear Judge Bernstein:

We represent Irving H. Picard, Trustee for the substantively consolidated liquidation of
Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff, in the
above-referenced adversary proceeding.

We respectfully request permission to file a brief in opposition to Defendants' Motion to Dismiss
Trustee's Amended Complaint filed on January 28, 2015 ("Defendants' Motion") in excess of
the page limit specified in Your Honor's Chambers Rules and of no more than fifty (50) pages in
length. This increase in the page limit is necessary to fully address each of the fourteen distinct
arguments raised in Defendants' Motion, including the fact-intensive issue of actual knowledge
as it relates to Defendants' ability to invoke the safe harbor contained in section 546(e) of the
Bankruptcy Code. The current deadline to file this opposition brief is May 21, 2015.

Granted
SMB
5/18/15

Defendants have indicated to the Trustee that they do not object to this request. We appreciate
Your Honor's attention to this matter.

Respectfully submitted,

/s/ Jimmy Fokas

Jimmy Fokas

cc: Gary A. Woodfield (via e-mail: gwoodfield@haileshaw.com)
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